



4545 Northwestern Drive | Zionsville, IN 46077
OFFICE 317.363.2400 | FAX 317.363.2257 | schuckitLAW.com

September 2, 2021

MEMO ENDORSED

VIA ECF ONLY

Honorable Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
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RE: *Avrohom Manes v. Trans Union, LLC, et al.*
U.S. District Court, Southern District of New York
Case No.: 7:20-cv-11059-KMK

Your Honor,

Pursuant to the Court's Scheduling Order, Doc. No. 46, and the Court's Order, Doc. No. 68, Plaintiff and Defendants, JPMorgan Chase Bank, N.A. ("JPMCB"), Experian Information Solutions, Inc. ("Experian") and Trans Union, LLC ("Trans Union"), through their undersigned counsel, hereby submit this joint Status Letter.

1. An Initial Pre-Trial Conference in this matter was held on June 11, 2021. The Court did not enter a Scheduling Order at that time. Doc. No. 46.

2. A Settlement Conference was scheduled to take place on August 9, 2021 with Magistrate Judge Lehrburger but was adjourned at Plaintiff's request due to a family emergency to a date to be determined. See Doc. No. 67. A new date has not yet been scheduled.

3. Additionally, in connection with JPMCB's pending Rule 12(b)(6) motion, Your Honor extended Plaintiff's time to file opposition in view of counsel's family emergency, directing Plaintiff to file his opposition by September 17, 2021, and JPMCB to file its reply by October 1, 2021. See Doc. No. 66.

4. A Status Conference is scheduled for September 10, 2021 in this matter.

5. Counsel have conferred regarding this matter, and Plaintiff's counsel states that his family situation has not resolved, that his client still would like him to represent him in this matter and that he seeks an additional 30-day postponement of the current deadlines in the hope that at that time the circumstances necessitating this delay will have improved such that the matter may proceed.

6. Defendants JPMCB, Experian and Trans Union do not object.

Respectfully Submitted,

<u>/s/ Camille Nicodemus</u> Camille Nicodemus, Esq. SCHUCKIT & ASSOCIATES, P.C. 4545 Northwestern Drive Zionsville, IN 46077 Tel. 317-363-2400, Ext. 105 Email: cnicodemus@schuckitlaw.com <i>Counsel for Defendant Trans Union, LLC</i>	<u>/s/ Juliana Clay</u> Juliana Clay, Esq. JONES DAY 250 Vesey Street New York, NY 10281 Tel: 212-326-7881 Email: Jclay@jonesday.Com <i>Counsel for Experian Information Solutions, Inc.</i>
<u>/s/Christopher B. Turcotte</u> Christopher B. Turcotte, Esq. TURCOTTE LAW, P.C. 575 Madison Avenue, Suite 1006 New York, New York 10022 (212) 937-8499 Email: cturcotte@cbtlaw.com <i>Counsel for Defendant JPMorgan Chase Bank, N.A.</i>	<u>/s/ Daniel G. Ashburn</u> Daniel G. Ashburn, Esq. ASHBURN LAW OFFICE LLC 1300 Carolyn Drive Atlanta, GA 30329 404-939-1323 Email: dashburn.ga@gmail.com <i>Counsel for Plaintiff</i>

Plaintiff's opposition to JPMorgan Chase Bank, N.A.'s motion to dismiss is due by **October 17, 2021**. Defendant's reply is due by **November 5, 2021**. No further extensions will be granted. If Plaintiff's counsel's family emergency has not been resolved by that point, he must contact an additional attorney to assist him.

The pretrial conference scheduled for September 10, 2021 is adjourned to **October 15, 2021 at 10:00 a.m.** The parties must appear for the conference by dialing (888) 363-4749, using the access code 3121171 and the security code 1059. A joint letter is due by **October 7, 2021**.

The parties are reminded that the correct docket number in this case is 20-cv-1109 (VEC).

SO ORDERED.



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HON. VALERIE CAPRONI
 UNITED STATES DISTRICT JUDGE